IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA Civil Action No. 1:12-cv-00548

CHARLENE RAIFORD)	
)	
Plaintiff,)	
)	
V.)	MOTION TO STAY
)	PROCEEDINGS
NORTH CAROLINA CENTRAL)	
UNIVERSITY, through the BOARD)	
OF GOVERNORS OF THE)	
UNIVERSITY OF NORTH CAROLINA)	
and RAYMOND PIERCE, LAUREN)	
COLLINS, and NICHELLE PERRY in)	
their individual capacities,)	
)	
Defendants.)	

NOW COME Defendants North Carolina Central University through the Board of Governors of the University of North Carolina (NCCU), Raymond Pierce, Lauren Collins, and Nichelle Perry, and hereby moves the court to stay all proceedings and discovery in this case pending the court's ruling on Defendants' motion to dismiss as to Plaintiff's amended complaint. In support, Defendants show that staying all further proceedings in this case until after a ruling on Defendants' motion to dismiss would promote judicial efficiency. The pending motion to dismiss addresses several claims and will impact significantly the extent and nature of discovery.

WHEREFORE, Defendants pray this court grant a stay of all proceedings and discovery in this case pending resolution of Defendant's motion to dismiss Plaintiff's amended complaint.

Respectfully submitted, this the 16th day of November, 2012.

ROY COOPER Attorney General

/s/ Kimberly D. Potter Kimberly D. Potter Special Deputy Attorney General N.C. Bar No. 24314 N.C. Department of Justice P.O. Box 629 Raleigh, N.C. 27602-0629 Tele: (919) 716-6920

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CERTIFICATE OF SERVICE

I certify that the foregoing **DEFENDANTS' MOTION TO STAY DISCOVERY** was electronically filed on November 16, 2012 with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Matthew Johnson and Shaun Southworth, Attorneys for Plaintiff, if registered or, I hereby certify that I have mailed the document to the following non CM/ECF participant:

Matthew Johnson Shaun C. Southworth Melville Johnson, P.C. 22 Seventh Street N.E. Atlanta, GA 30308

This 16th day of November 2012.

ROY COOPER Attorney General

/s/ Kimberly D. Potter Kimberly D. Potter Special Deputy Attorney General